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owned by him, which was attached in another proceeding, and to secure bail in that proceeding. The defendant showed that it was also the stockholder's purpose to gather material for bringing annoying suits against the corporation, so that the members of the corporation would buy his shares of stock at a price agreeable to him. *Held*, mandamus refused. *State ex rel. Linihan v. United Brokerage Co.* (Del.), 101 Atl. 433.

It is a general rule of corporation law that stockholders have the right to inspect the corporate books and records for proper purposes and at proper times, since they are the common property of all the stockholders. *Commonwealth v. Phoenix Iron Co.*, 105 Pa. St. 111; *Re Steinway*, 159 N. Y. 250, 45 L. R. A. 461. Although a corporation is a legal entity, a stockholder has property therein and is entitled to see that his property is well managed. *Cockburn v. Union Bank*, 13 La. Ann. 289. But the right will be denied when it is demanded for an improper purpose. *People v. Lake Shore, etc., R. Co.*, 11 Hun. (N. Y.) 1. Sound discretion should be exercised to determine whether the stockholder has a reasonable and proper purpose. *Varney v. Baker*, 194 Mass. 239, 80 N. E. 524. Thus it has been held that even a director of a corporation has no right to examine its letter files for the purpose of gathering information for a new and rival corporation, in which he is interested. *Hemingway v. Hemingway*, 58 Conn. 443, 19 Atl. 766. The interests of the other stockholders must not be overlooked, so it has been held that the right of inspection will be refused if the purpose of the petitioning stockholder is to destroy the corporation. *In re Coats*, 73 App. Div. 176, 76 N. Y. Supp. 730.

The fact that the petitioner is on bad terms with the officers of the corporation is no ground for refusing the right of inspection. *Huyler v. Cragin Cattle Co.*, 40 N. J. Eq. 392, 2 Atl. 274. Nor is the mere fact that the stockholder also owns stock in a rival corporation grounds for refusal of the right, if his purpose is reasonable. *Furst v. Rawleigh*, 154 Ill. App. 522; *Hodder v. George Hogg Co.*, 223 Pa. 196, 72 Atl. 553.

There are statutes in some States granting this right absolutely to a stockholder. It is generally held under these statutes that a bona fide stockholder may inspect the books of the corporation regardless of his motive. *Kimball v. Dern*, 39 Utah 184, 116 Pac. 28.

CORPORATION—SERVICE OF PROCESS ON FOREIGN CORPORATION—RESIDENT DIRECTOR.—The plaintiff in error was a corporation chartered in Ohio, and carried on its principal business there. In 1901, it entered into certain transactions by which it assumed the obligation to pay in New York certain bonds with coupons annexed thereto. About five years later, default having been made, suit was brought in New York against the corporation, and service of process was made on a director and the vice-president, who resided in New York. The above transaction was the only business done by the plaintiff in New York. *Held*, service of process invalid. *Toledo Railways & Light Co. v. Hill*, 37 Sup. Ct. 591. See NOTES, p. 59.

FALSE IMPRISONMENT—ARREST WITHOUT WARRANT—JUSTIFICATION OF PRIVATE CITIZEN.—The plaintiff was arrested without a warrant by two